

CLAIM 88. (Cancelled)
CLAIM 89. (Cancelled)
CLAIM 90. (Cancelled)
CLAIM 91. (Cancelled)
CLAIM 92. (Cancelled)

REMARKS

The Examiner has objected to the abstract for lacking detail. It is applicants' position that the abstract would be confusing if amended to include numerals due to the number of embodiments. It is also likely that the abstract would exceed the word limitation. Applicants are also aware of no requirement that numerals be placed in an abstract in the U.S. Upon review of the abstract, applicants believe that it is sufficient and clear and will lead one of ordinary skill in the art to a rapid conclusion as to whether more in depth consideration of the disclosure hereof would be warranted in view of a particular search being conducted.

With respect to the Examiner's comments regarding Figures 4, 5, 7 and 8, it is not clear to applicants why there is an issue as it is believed that formal drawings have been submitted, however, in order to advance the prosecution of the application, and avoid further confusion, applicants submit herewith a new set of formal drawings for the application.

Applicants note at this point that several rejections have been made which are directed to solely subject matter which is no longer in the application due to cancellation of claims. It is therefore not relevant to discuss those rejections as they have become moot. Applicants have considered which claims remain in the application and have cross-referenced those claims to the rejections made by the Examiner so that only rejections which are directed to claims remaining in the application can be considered in this response. The claims that remain in the application are 26-55 and 65-68.

The Examiner has rejected claims 56-85 and 90-92 which applies now to remaining claims 65-68, under 35 U.S.C. §102(b) as being anticipated by or in the alternative under 35 U.S.C. §103(a) for being obvious over Walker alone or taken in view of Davis and Cunningham. Walker et al. discloses an umbilical connector. Provisions are made for its disconnection in the sub-sea environment, but it is not clear that it can be connected in the sub-sea (wet) environment. Moreover, there is no third section as claimed in the remaining claims of this application. Clearly, applicants' claims are directed to a

device that is indeed connected and disconnected in the wet downhole environment. There does not appear to be a relationship between applicants' claims and Walker. Walker is directed to an umbilical cord connection that is in a location that is not downhole but rather is in open water. Because the device of Walker et al. is not taught to be utilized in any way within a downhole environment, the teaching therein merely teaches one of ordinary skill in the art how to have and break a connection in mid-water. It does not teach one of ordinary skill in the art how to make a conductor connection device for a downhole environment according to applicants' claims. The Examiner combines this teaching with the teaching of Cunningham and Davis which are directed to downhole implements. The issues faced by Cunningham and Davis are not faced by Walker et al. and Walker et al. would have no reason to look to Cunningham and Davis for a solution to a problem he does not have. There is no reason to combine the teachings of these references and it is submitted one of ordinary skill in the art would immediately dismiss the suggestion of combination because it simply does not make sense to combine elements from such different concepts. It is believed that this combination is not proper for the reasons stated above. Applicants therefore respectfully request withdrawal of the rejection.

The Examiner has rejected claims 65-68, [69, 73-85 and 90-92 have been cancelled] under 35 U.S.C. §102(b) as anticipated by or in the alternative under 35 U.S.C. §103(a) for being obvious over Hopper alone or in view of Dean. As stated, in the remarks directed to the foregoing rejection, the claims of the present invention require a third section. Hopper alone or in combination with Dean does not teach such section at a minimum, and, therefore, the rejection should not stand. Moreover, there is no teaching within the Hopper reference of maintaining contact in the clean or cleanable condition, and, in fact they do nothing to address the condition of the contacts themselves, rather contact is made and then the area around the contacts is flushed with dielectric fluid. This does not anticipate all elements of claim 65 since it has no teaching, disclosure or suggestion of a third section or that contacts are maintained clean or are cleanable. Dean has been cited only to illustrate uphole and downhole wiring. It does not appear necessary to discuss the teaching of Dean at this point in view of the distinguishing remarks set forth above with respect to Hopper.

Claims 2-56 and 61-92, of which claims 26-55 and 65-68 remain in the application, have been rejected under 35 U.S.C. §102(b) for being anticipated by or in the alternative under 35 U.S.C. §103(a) for being obvious over Cunningham alone or in view of Busuttil, Walker, Davis and Morrison. The Examiner's point of view with respect to this rejection relies heavily on Cunningham who clearly

teaches that the problem they are solving is making of electrical connections within the drill pipe at the surface and in order to avoid the need for rig personnel to wipe off every contact prior to screwing joints together. There is no teaching, disclosure or even a suggestion within Cunningham regarding the making up of electrical connections in the downhole environment and in a wet environment. The device taught by Cunningham is not likely to be able to perform if an attempt was made to make the connection in a wet environment. The claims of the present application require that the connection be capable of makeup in a wet environment and the application teaches one to do so. The claims further require the existence of the third section that includes the forth connector, not indicated to have been made of portion of an active connection. Such a connector is not taught in the references relied upon by the Examiner.

With respect to claims 50-53 the Examiner indicates that the contacts of the references relied upon would be meltable if heat were applied. Indeed, all metal is meltable if heat is applied; there is, however, no teaching in those references to melt the contact. With respect to the Examiner's comment regarding the purpose or advantage of the feature over conventional connection and the earlier comment "just why melting would be used is unclear. It would prevent future separation and has not been shown to provide any advantages or purpose over standard connections.", applicants note that there is no requirement in the patent law that an advantage be gained by a particular invention. Rather, the invention must have utility, novelty and be non-obvious. There is no teaching, disclosure or suggestion in any of the references cited by Examiner or by applicants that teaches one of ordinary skill in the art to melt the contacts. In such case, claims directed to melting contacts are patentable. It is also noted that in accordance with the claims of this application, the melting of the contacts would not prevent future separation. It is the second section that is separated from the third section while the third section is connected to the first. Thus, a connection made by melting between the third connectors and first connectors does not need to be separated.

Finally, the Examiner has rejected claims 2-56 and 61-68, of which claims 26-55 and 65-68 are remaining in the application, under 35 U.S.C. §102(b) for being anticipated by or in the alternative under 35 U.S.C. §103(a) for being obvious over Chevalier alone or in view of Cunningham, Busuttil, and Morrison. Applicants upon reviewing the Chevalier reference, are certain that the Examiner understands that intermediary connector 13 is simply a connection extender having both male and female components which is bolted in place at the time of building of the device. There is no teaching of

a third section having third connectors and forth connectors in operable communication with a third conductor. There also does not appear to be any teaching within this reference of makeup and breaking of electrical connections in a wet environment as required by the claims of the present application. The teachings of Cunningham, Busuttil, and Morrison do not remedy the lack of teaching of Chevalier therefore, applicants believe that the rejection should not stand and respectfully request reconsideration and withdrawal thereof by the Examiner.

In the event the Examiner has any queries regarding the instantly submitted Amendment, Applicants' attorney respectfully requests the courtesy of a telephone conference to discuss any matters in need of attention.

In the event that there are any fees due with respect to this Response, Applicants' attorney respectfully requests that such fees be withdrawn from Deposit Account No. 02-0429 maintained by Applicants' assignee.

Respectfully submitted,

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